



DEPARTMENT OF ENVIRONMENTAL QUALITY

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GOVERNOR

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SECRETARY

September 4, 2007

Ms. Corinne Macaluso
U.S. Department of Energy
c/o Patricia Temple
Bechtel, SAIC Company, LLC.
955 N. L'Enfant Plaza, SW, Suite 8000
Washington, DC 20024

Re: Federal Register Notice, Volume 72, Number 140, Monday, July 23, 2007

Dear Ms. Macaluso:

The State of Louisiana, Department of Environmental Quality (LDEQ) appreciates the opportunity to submit comments on the Office of Civilian Radioactive Waste Management; Safe Routine Transportation and Emergency Response Training; Technical Assistance and Funding Revised Policy. This policy revision presents the opportunity to address the need for training and preparedness with regard to the shipment of spent nuclear fuel or other high level radioactive waste. While the policy is very thorough in its explanation of the methods by which a grant may be applied for and awarded to a State or Tribe, there are concerns that the policy does not address. LDEQ would like to receive more information and further clarification on some of these concerns.

The first, most obvious concern, noted is the lack of available information regarding the routes by which these shipments will travel. The policy does not identify shipment routes nor does it provide a reference to any documents in which this vital information may be obtained. To determine an appropriate cost estimate for both planning and training, the identified routes must be made available to the States and Tribes.

The section of the revised policy addressing activities for which the planning grant money can be used, makes reference to assessing the need for training on procedures related to safe routine transportation. There must be additional clarification on what these procedures are and who is responsible for writing and maintaining them. Clarification on the expectations whether or not the State and/or Tribal officials will write and maintain such procedures is required. If DOE has the expectation that the State and locals will write and maintain these procedures, then DOE should provide training and guidance on the development of necessary procedures.

Designing, conducting, and evaluating drills and exercises are identified as acceptable activities for the training grant money. This implies that exercises will be conducted and evaluated at the State

ENVIRONMENTAL COMPLIANCE

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